

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DAVITA M. KEY,)	
)	
Plaintiff,)	
)	
v.)	CIVIL CASE NO. 2:19-cv-767-ECM
)	
DYNAMIC SECURITY, INC.)	
)	UNOPPOSED
Defendant.)	

**DYNAMIC SECURITY INC.’S MOTION FOR THREE-DAY
ENLARGEMENT OF TIME TO FILE ITS REPLY AS TO ITS MOTION
FOR RENEWED JUDGMENT AS A MATTER OF LAW AND MOTION
FOR THREE-DAY ENLARGEMENT OF TIME FOR PLAINTIFF TO FILE
HER REPLY AS TO HER MOTION FOR EQUITABLE RELIEF**

COMES NOW Defendant Dynamic Security, Inc. (“Dynamic”) and requests this Court grant a three-day extension of time for Dynamic to file its reply to “Plaintiff’s Response in Opposition to Defendant Dynamic Security, Inc.’s Motion for Renewed Judgment As a Matter of Law as to the Liability and Punitive Damages; To Vacate, Alter or Amend the Judgment; or, Alternatively, for a New Trial Or Remittitur of Emotional Distress and Punitive Damages” (hereinafter “Dynamic’s Motion for Renewed Judgment as a Matter of Law”) (Doc. 206) and a three-day extension of time for Plaintiff Davita Key to file her reply to “Defendant Dynamic Security, Inc.’s Response to Plaintiff’s Motion for Equitable Relief of Reinstatement

and Interest (hereinafter “Plaintiff’s Motion for Equitable Relief”). (Doc. 207).

Dynamic’s unopposed motion is based on the following grounds:

1. On April 26, 2023, Dynamic timely filed its Motion for Renewed Judgment as a Matter of Law. (Doc. 197).

2. On June 27, 2023, Plaintiff timely filed her response in opposition to this motion. (Doc. 206).

3. Defendant’s reply is currently due to be filed on or before July 5, 2023.

4. On April 25, 2023, Plaintiff timely filed Plaintiff’s Motion for Equitable Relief of Reinstatement and Interest (Doc. 193).

5. On June 27, 2024, Defendant timely filed its response to this motion. (Doc. 207).

6. Plaintiff’s reply is currently due to be filed on or before July 5, 2023.

7. Dynamic now seeks a three-day extension of time to file its reply to Plaintiff’s Opposition to Dynamic’s Motion for Renewed Judgment as a Matter of Law, which would move the filing deadline from Wednesday, July 5, 2023, to Monday, July 10, 2023.

8. Dynamic likewise seeks a three-day extension of time for Plaintiff to file her reply to Defendant’s Response to Plaintiff’s Motion for Equitable Relief, Opposition to Dynamic’s Motion for Renewed Judgment as a Matter of Law, which

would move the filing deadline from Wednesday, July 5, 2023, to Monday, July 10, 2023.

9. Dynamic seeks this extension due to office closures on the intervening holiday and because undersigned counsel for Dynamic will be out of town and unavailable the entire week of July 3, 2023, through July 7, 2023. Further, Plaintiff's counsel are out of the office attending the National Employment Lawyers' Conference, returning to the office on July 5.

10. Undersigned counsel has communicated with Plaintiff's counsel, who stated that she agrees to an extension of both deadlines.

11. This brief extension of time will not prejudice any party or the Court.

Respectfully submitted,

/s/Susan W. Bullock
Wesley C. Redmond
Susan W. Bullock
FordHarrison LLP
420 20th Street North, Suite 2560
Birmingham, AL 35203
wredmond@fordharrison.com
sbullock@fordharrison.com
Phone: 205-244-5905
205-244-5904
Facsimile: 205-244-5901

Counsel for Dynamic Security, Inc.

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on 29th day of June, 2023, she electronically filed a true and correct copy of the foregoing with the Clerk of Court using the CM/ECF System, and a true and correct copy to counsel of record:

Heather Leonard
Heather Leonard, P.C.
2105 Devereaux Cir., Suite 111
Birmingham, AL 35243

Leslie A. Palmer, LLC
Palmer Law, LLC
104 23rd Street South, Suite 100
Birmingham, AL 35233

Counsel for Plaintiff

/s/ Susan W. Bullock
Of Counsel

WSACTIVE LLP:14122016.1